



August 19, 2011

US EPA RECORDS CENTER REGION 5



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Mr. W. Owen Thompson  
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U.S. EPA Region 5, SR-6J  
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Subject: Transmittal of Response to USEPA Review Comments  
*Additional Excavation of DS Tributary Work Plan (Revised)*  
Detrex Source Control Area – Fields Brook Superfund Site  
URS Corp., August 2, 2011  
Docket No. V-W-98-C-450

Dear Mr. Thompson:

On behalf of Detrex Corporation (Detrex), URS Corporation (URS) is providing responses to your review comments of the *Additional Excavation of DS Tributary Work Plan (Revised)*. Responses to these comments were discussed with USEPA on Wednesday, August 12, 2011. The following responses are being provided below.

**USEPA Comment No. 1:**

Detrex requested EPA to consider whether excavated soils could be placed in the Detrex Source Area. Since the DS Tributary west of State Road is not located on Detrex property, it is not considered “on-site” for the purposes of the RCRA on-site management exemption. The excavated materials will have to be disposed of off-site.

**Detrex Comment Response No. 1:**

*Detrex will dispose of all excavated soils and sediment from the excavation at an approved offsite landfill or disposal facility.*

**USEPA Comment No. 2:**

Note 1 on Figure 1 states that the existing DNAPL collection trenches will be removed with the excavation. Will these be replaced with new ones? If so, please modify the Figure to show the planned new locations.

**Detrex Comment Response No. 2:**

*Detrex will install a new DNAPL inspection trench downgradient of the restored portion of the DS Tributary channel. The location of the proposed inspection trench is shown on Figure 1. Details showing the trench construction are provided on the attached Figure 2 (Detail 3).*

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Mr. W. Owen Thompson  
United States Environmental Protection Agency  
August 19, 2011  
Page 2 of 2

**USEPA Comment No. 3:**

Please add an additional "Restored Plan" detail to Figure 2 to show a side elevation of the area at the west end of the State Road culvert as it empties into the DS Tributary, which indicates how the Aqua-Blok and cover materials will be tied into the existing structure.

**Detrex Comment Response No. 3:**

*Detrex has provided an additional side elevation of the west end of the State Road culvert to show how the Aqua-Blok and cover will be tied to the existing structure. Details showing the restoration are provided on the attached Figure 2 (Detail 4).*

**USEPA Comment No. 4:**

Provide clarification as to how deep the proposed excavation is: to excavate all materials that contained free liquid DNAPL, regardless of depth DNAPL is encountered; or to no deeper than 6 ft. below ground surface.

**Detrex Comment Response No. 4:**

*Detrex will excavate the DS Tributary channel no deeper than 6-ft below ground surface. During excavation, if DNAPL is observed at 6-ft, then onsite personnel (URS, Detrex, and USEPA representatives) will make a field decision as to needs for further excavation.*

We also discussed the project schedule. As discussed, Detrex plans to initiate this work on either the week of September 12 or 19, 2011. We will advise USEPS of actual start date the week of August 29, 2011.

We appreciate having the opportunity to review these comments with you. If you have any questions regarding this submittal, please do not hesitate to contact either Tom Steib 440-992-6131 or myself at 216-622-2432 at your convenience.

Sincerely,

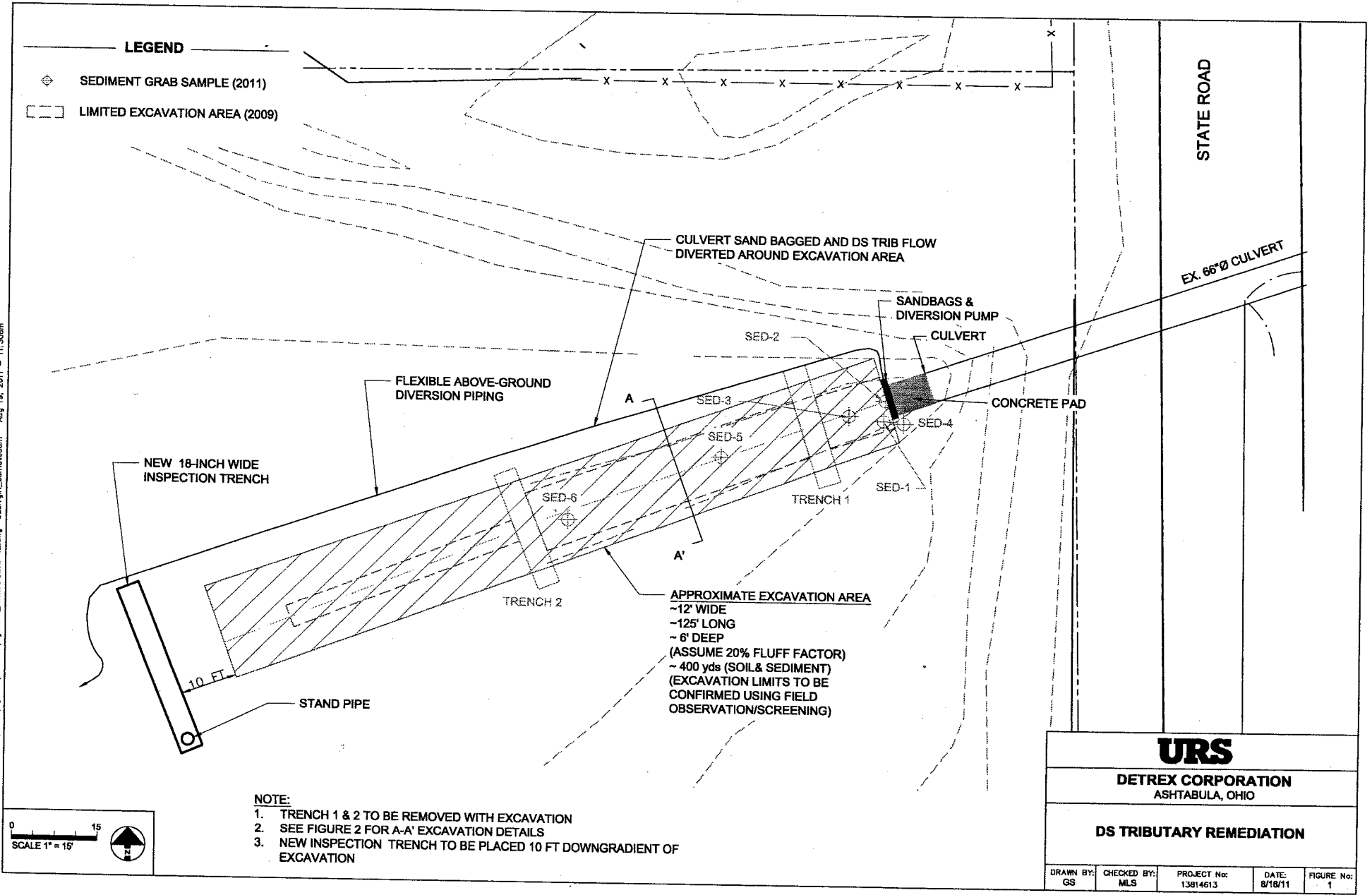
**URS Corporation - Ohio**

Martin L. Schmidt, Ph.D.  
Vice President

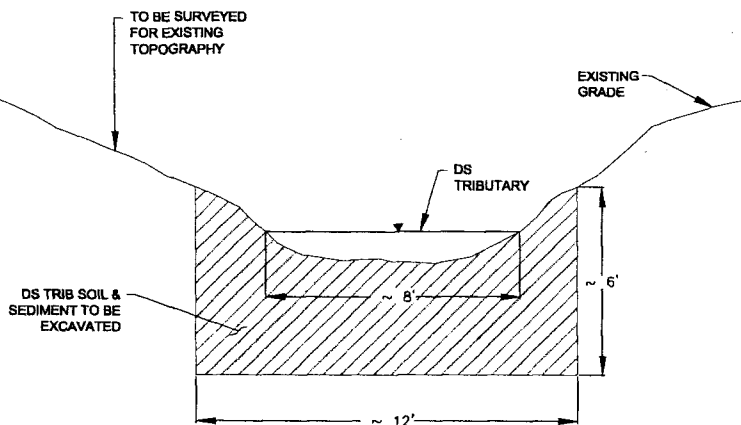
Enclosure – Figures 1 & 2

cc: R. Currie – Detrex Corporation  
T. Steib – Detrex Corporation  
T. Doll – Detrex Corporation  
D. Gray – URS Corporation  
Peter Felitti, U.S. EPA C-14J  
R. Williams – Ohio EPA  
W. Earle – SulTRAC  
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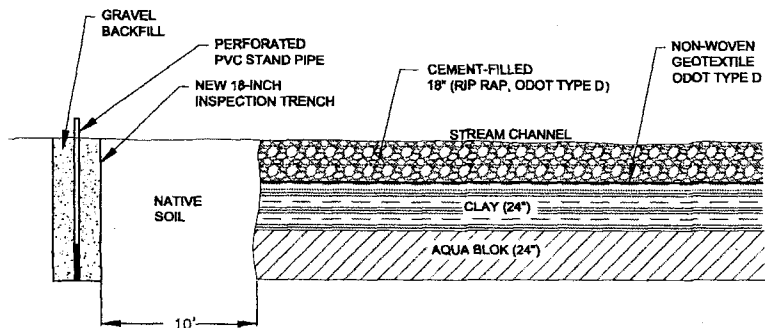
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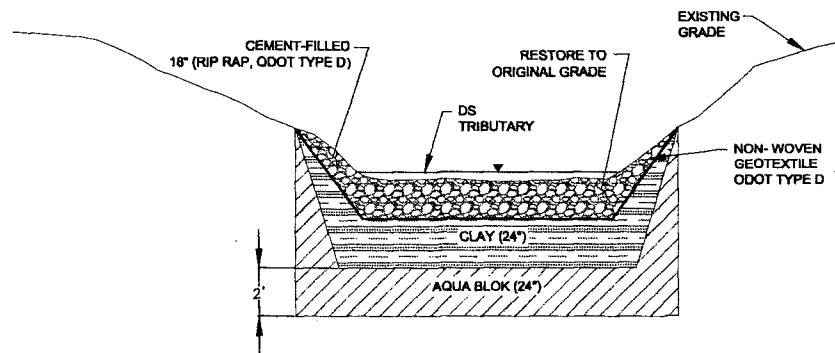
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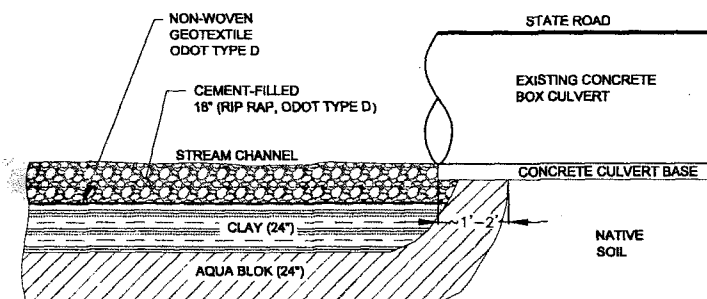
DETAIL 1:  
EXCAVATION PLAN



DETAIL 3:  
NEW INSPECTION TRENCH



DETAIL 2:  
RESTORATION PLAN



DETAIL 4:  
RESTORATION PLAN AT THE CULVERT

SCALE AS SHOWN

**URS**

**DETREX CORPORATION**  
ASHTABULA, OHIO

**DS TRIBUTARY REMEDIATION  
EXCAVATION DETAILS**

DRAWN BY: GS	CHECKED BY: MLS	PROJECT No: 13814613	DATE: 8/18/11	FIGURE No: 2
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